REMARKS

Claims 1-16 are pending in the present application. The Examiner has rejected claims 1-16 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,590,928 B1 ("Haartsen"). Applicant has amended claims 1, 11 and 14 and has added new claims 17-20.

Claims 1-10

In the Office Action Made Final, the Examiner alleges that the "master address" in Haartsen is the "member address" recited in claim 1 and that the "member address" in Haartsen is the first "extended address" recited in claim 1. Applicant respectfully disagrees with the Examiner that the "member address" in Haartsen is an "*extended* address" (emphasis added) as recited in claim 1. Applicant respectfully submits that the Examiner has not given the full weight to each and every element as recited in claim 1 and, in particular, to the phrase "extended" in "extended address". Applicant respectfully submits that the "member address" in Haartsen is not an "extended address" as recited in claim 1.

In addition to the above arguments, Applicant has amended claim 1 to recite "assigning a member address *of a Bluetooth protocol* to a first slave unit" (emphasis added). It is well known by one of ordinary skill in the art that a "member address" of a Bluetooth protocol is different from a "master address" of a Bluetooth protocol. Each address is defined differently in a Bluetooth protocol. The "master address" in Haartsen serves many of the same or similar purposes as the "master address" in a Bluetooth protocol. See, e.g., Abstract of Haartsen which differentiates between a master address and a slave address. Thus, the "master address" in Haartsen is different from "a member address of a Bluetooth protocol" as recited in claim 1 and does not describe "a member address of a Bluetooth protocol" as recited in claim 1. It is therefore respectfully requested that the anticipation rejection be withdrawn with respect to claim 1 and its dependent claims.

Furthermore, some of the dependent claims also recite elements that are not anticipated by Haartsen.

For example, claim 2 recites that "assigning to a second slave unit *said* member address" (emphasis added). In view of claims 1 and 2, the first slave unit and the second slave unit are assigned the same member address of a Bluetooth protocol (which is not the "master address" of Haartsen as discussed above). Haartsen does not describe two slave units being assigned the

same member address. Instead, Haartsen describes that "the member address is a 3-bit address in the packet header. The 3-bit address limits the number of participants in a piconet to eight." See Haartsen at col. 12, lines 42-45. In other words, there is a one-to-one correspondence between the "member address" in Haartsen and the slave units in the piconet. Haartsen does not describe slave units having the same "member address" as recited in claims 1 and 2. For at least these reasons, the anticipation rejection cannot be maintained with respect to claim 2.

In another example, claim 3 recites "said maximum permitted number of slave units being determined by performing a division operation in which a bandwidth associated with said member address is divided by a bandwidth allocated to said first slave unit, said maximum permitted number of slave units being no greater than a quotient of said division operation". The Examiner alleges that all of these elements are met because "the bandwidth is divided by 8, so up to 8 slaves can be accommodated by the master unit" and cites Haartsen at col. 12, lines 28-49. However, this allegation by the Examiner might allegedly assume that the "master address" in Haartsen is the "member address" recited in claim 1. As discussed above, the interpretation of the "master address" in Haartsen as the "member address" recited in claim 1 cannot be maintained. Therefore, the Examiner's assertion that the bandwidth associated with the "master address" in Haartsen is divided by 8 is no longer an applicable argument. Instead, the Examiner must argue that the same "member address" of a Bluetooth protocol (which is not the "master address" in Haartsen) is assigned to a first slave unit (claim 1) and to a second slave unit (claim 2). Neither the "member address" in Haartsen nor the "master address" in Haartsen describes, as recited in claims 1 and 2, the same "member address" of a Bluetooth protocol assigned to the first slave unit and the second slave unit, the member address being associated with a bandwidth that is divided as recited in claim 3. Applicant respectfully submits that Haartsen does not describe at least these elements. For at least these reasons, the anticipation rejection cannot be maintained with respect to claim 3.

Since the Examiner cannot maintain the allegation that a "master address" in Haartsen describes the "member address of a Bluetooth protocol" as recited in claim 1, most of the arguments alleged by the Examiner with respect to dependent claims 4-10 are no longer applicable.

Claims 17-20 have been added. It is believed that these new claims are also patentable.

For at least the above reasons, Haartsen does not anticipate claims 1-10. It is respectfully requested that the rejection under 35 U.S.C. § 102(e) be withdrawn with respect to claims 1-10. Furthermore, Applicant respectfully submits that claims 1-10 and 17-20 are in condition for allowance.

Claims 11-13

As discussed previously, Applicant respectfully disagrees with the Examiner's allegation that the "master address" in Haartsen is the "member address" recited in claim 11 and that the "member address" in Haartsen is the first "extended address" recited in claim 11. In addition to the above arguments, Applicant have amended claim 11 to recite "means for assigning a member address *of a Bluetooth protocol* to said first slave unit" (emphasis added). In view of the arguments made above, Applicant respectfully submits that Haartsen does not describe each and every element as set forth in claim 11. It is respectfully requested that the anticipation rejection be withdrawn with respect to claim 11 and its dependent claims (i.e., claims 12 and 13).

Furthermore, some of the dependent claims also recite elements that are not anticipated by Haartsen.

For example, claim 12 recites that "means for assigning to said second slave unit said member address". In view of claims 11 and 12, the first slave unit and the second slave unit are assigned the same member address of a Bluetooth protocol. As discussed above with respect to claim 2, Haartsen does not describe two slave units being assigned the same member address of a Bluetooth protocol. For at least these reasons, the anticipation rejection cannot be maintained with respect to claim 2.

Since the Examiner cannot maintain the allegation that a "master address" in Haartsen is the "member address of a Bluetooth protocol" as recited in claim 11, most of the arguments alleged by the Examiner with respect to dependent claims 12 and 13 are no longer applicable.

For at least the above reasons, Haartsen does not anticipate claims 11-13. It is respectfully requested that the rejection under 35 U.S.C. § 102(e) be withdrawn with respect to claims 11-13.

Claims 14-16

As discussed previously, Applicant respectfully disagrees with the Examiner's allegation that the "master address" in Haartsen is the "member address" recited in claim 14 and that the "member address" in Haartsen is the first "extended address" recited in claim 14. In addition to the above arguments, Applicant has amended claim 14 to recite "means for assigning a member address *of a Bluetooth protocol* to said first slave unit" (emphasis added). In view of the arguments made above, Applicant respectfully submits that Haartsen does not describe each and every element as set forth in claim 14. It is respectfully requested that the anticipation rejection be withdrawn with respect to claim 14 and its dependent claims (i.e., claims 15 and 16).

Furthermore, some of the dependent claims also recite elements that are not anticipated by Haartsen.

For example, claim 15 recites that "means for assigning to a second slave unit said member address". In view of claims 14 and 15, the first slave unit and the second slave unit are assigned the same member address of a Bluetooth protocol. As discussed above with respect to claims 2 and 12, Haartsen does not describe two slave units being assigned the same member address of a Bluetooth protocol. For at least these reasons, the anticipation rejection cannot be maintained with respect to claim 15.

Since the Examiner cannot maintain the allegation that a "master address" in Haartsen is the "member address of a Bluetooth protocol" as recited in claim 11, most of the arguments alleged by the Examiner with respect to dependent claims 15 and 16 are no longer applicable.

It is respectfully requested that the rejection under 35 U.S.C. § 102(e) be withdrawn with respect to claims 14-16.
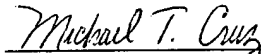
Conclusion

In view of at least the foregoing, it is respectfully submitted that the pending claims 1-20 are in condition for allowance. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the below-listed telephone number.

Please charge any required fees not paid herewith or credit any overpayment to the Deposit Account of McAndrews, Held & Malloy, Ltd., Account No. 13-0017.

Dated: <u>March 10, 2005</u>   Respectfully submitted,

Michael T. Cruz

Michael T. Cruz
Reg. No. 44,636

McAndrews, Held & Malloy, Ltd.
500 West Madison Street, 34th Floor
Chicago, Illinois 60661-2565
Telephone: (312) 775-8084
Facsimile: (312) 775-8100